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August 10, 2020

VIA ECF

Honorable Barbara Moses, U.S.M.J.
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

**Re: De La Cruz v. Manhattan Parking Group et al.
Case No. 1:20-cv-00977 (JPO) (BCM)**

Dear Judge Moses:

We are counsel for the Defendants in connection with the above-referenced case, and submit this letter jointly with counsel for Plaintiff pursuant to the Court's June 30, 2020 Initial Case Management Order (ECF Docket # 48) and in anticipation of the status conference with the Court scheduled for August 12, 2020 at 11:00 a.m.

As the Court is aware, this lawsuit is a putative class and collective action in which Plaintiff alleges claims pursuant to the Fair Labor Standards Act and New York Labor Law. Since the June 30th conference with the Court both sides have served written discovery requests and have conferred about the possibility of settlement. Specifically, the parties have discussed parameters for Defendants to produce a sampling of time and pay records for certain putative class members, which will be used by both sides to value the case for classwide settlement negotiations. Thereafter, the parties intend to schedule a private mediation session, which we anticipate will occur over the course of the next 60 to 90 days.



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The parties look forward to discussing the case with the Court in greater detail during the August 12th conference. We thank the Court for its consideration in this regard.

Respectfully submitted,

JACKSON LEWIS P.C.

A handwritten signature in black ink, appearing to read "JASON A. ZOLDESSY".

Jason A. Zoldessy

cc: All Counsel (Via ECF)